

# Exhibit B

## Angelica Mecias

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**From:** Victor Careaga <victoracareaga23@gmail.com>  
**Sent:** Thursday, February 9, 2023 10:15 AM  
**To:** Robert Kuntz  
**Cc:** Angelica Mecias  
**Subject:** [EXTERNAL] Re: FW: Deposition Subpoena

**This Message originated outside your organization.**

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Good morning Mr. Kuntz,

Thank you for your emails this morning. This is the first time I see the subpoena for deposition because I was expecting an email from you, and was not on the lookout for an email from Angelica Mecias which apparently was sent by her back on February 1st.

I have agreed to the deposition on March 7th at 10:00 a.m.. I accept the service of your subpoena via email, so that you avoid service of process costs.

Very truly yours,

**Victor Careaga**

On Thu, Feb 9, 2023 at 9:51 AM Robert Kuntz <[rkuntz@riveromestre.com](mailto:rkuntz@riveromestre.com)> wrote:

Mr. Careaga:

As agreed with you, on 1 February 2023 we emailed you the subpoena for your 7 March deposition. Will you kindly confirm that you have received and accept service.

### RIVERO MESTRE

**Robert Kuntz**

Partner

Rivero Mestre LLP

2525 Ponce de Leon Blvd., Suite 1000

Miami, Florida 33134

(O) (305) 445-2500 | (D) (786) 746-8209

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[rkuntz@riveromestre.com](mailto:rkuntz@riveromestre.com)

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been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

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**From:** Angelica Mecias <[amecias@riveromestre.com](mailto:amecias@riveromestre.com)>  
**Sent:** Wednesday, February 1, 2023 4:22 PM  
**To:** Victor Careaga <[victoracareaga23@gmail.com](mailto:victoracareaga23@gmail.com)>  
**Cc:** Robert Kuntz <[rkuntz@riveromestre.com](mailto:rkuntz@riveromestre.com)>  
**Subject:** Deposition Subpoena

Hello Mr. Careaga,

Thank you so much for making yourself available on March 7th. We are attaching a subpoena for you to testify at a deposition scheduled on **March 7th, 2023, at 10 AM** at the offices of Rivero Mestre LLP.

Regards,

## RIVERO MESTRE

**Angelica Mecias**  
Rivero Mestre LLP  
2525 Ponce de Leon Blvd., Suite 1000  
Miami, Florida 33134  
(O) (305) 445-2500 | (D) (786) 746-8229  
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**From:** Victor Careaga <[victoracareaga23@gmail.com](mailto:victoracareaga23@gmail.com)>  
**Sent:** Monday, January 30, 2023 6:08 PM  
**To:** Robert Kuntz <[rkuntz@riveromestre.com](mailto:rkuntz@riveromestre.com)>  
**Cc:** Angelica Mecias <[amecias@riveromestre.com](mailto:amecias@riveromestre.com)>  
**Subject:** [EXTERNAL] Re: Setting your deposition

**This Message originated outside your organization.**

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Hello Mr. Kuntz,

I have had a very busy afternoon, and apologize for not contacting you earlier.

I do not recall proposing March 3rd. In any event, Tuesday March the 7th would be my preference, at 10:00 a.m.

Let me know if that works for you.

**Victor Careaga**

On Mon, Jan 30, 2023 at 6:02 PM Robert Kuntz <[rkuntz@riveromestre.com](mailto:rkuntz@riveromestre.com)> wrote:

Mr. Careaga:

After our cordial chat this morning, when you told me to expect to hear from you with a date certain for your deposition before the close of today's business, I was disappointed to get to 1800 with no word from you.

Because time is of the essence in this matter, we will not be delayed in setting down your deposition. But in hopes that we may continue on a cordial basis, I'll allow you one more day to revert to us with a date. (We had proposed 1 March, but your suggestion of 3

March would certainly be acceptable.) If, however, we haven't settled on a date by this time tomorrow, we will have recourse but to ask Judge Lenard to intervene, setting forth in full our efforts to date.

I look forward to hearing from you.

## RIVERO MESTRE

### Robert Kuntz

Partner

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